



VITEMA VIRGIN ISLANDS TERRITORIAL EMERGENCY MANAGEMENT AGENCY

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March 4, 2019

Michael J. Wilhelm
Chief, Policy and Licensing Division
Public Safety and Homeland Security Bureau
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

Re: Federal Communications U.S. Virgin Islands Live WEA and EAS Test
PS Docket Nos. 15-91 and 15-94

Dear Chief Wilhelm:

The Virgin Islands Territorial Emergency Management Agency (VITEMA or The Agency) hereby requests a waiver of the Commission's rules on behalf of Commercial Mobile Service (CMS) Providers and Emergency Alert System (EAS) Participants to conduct a live-code Wireless Emergency Alert (WEA) and EAS test on March 14, 2019 at 10:00AM (EST), as part of the Caribe Wave 2019 – Tsunami Warning Exercise¹. Pending your approval, the live test will use a Civil Emergency Message (CEM) EAS message on radio, television and cable, and on mobile phones via the WEA in English, using FIPS Code 078000. The WEA and EAS message will read: "This is a test of the U.S. Virgin Islands Tsunami Warning System. No Action is required." The WEA message is 90 characters long. The test is not intended to be a substitute for other scheduled tests of the EAS or the monthly test of the WEA. If severe weather or a tropical system threatens the area within a day or two prior to the test, VITEMA will consult with NOAA and FEMA to consider cancellation.

The test will mark the beginning of the Caribe Wave 2019 exercise. The test target area will only cover the U.S. Virgin Islands and will include major and local cellular networks (Sprint, AT&T, VIYA and AirVoice VI) as well as all EAS Participants, which would allow the Agency to conduct a survey following the test to gauge delivery success. VITEMA is working with FEMA IPAWS to conduct preliminary closed-circuit tests with the IPAWS Laboratory prior to the March 14th test.

¹ A Participating CMS Provider is an FCC licensee providing commercial mobile service as defined in Section 332(d) (1) of the Communications Act of 1934 that has voluntarily elected to transmit WEA Messages under Part 10 of the FCC's Rules. See 47 CFR §10.10 (d) & (f). An EAS Participant is an FCC licensee that is required to comply with the FCC's EAS rules. See 47 CFR §11.2(b).

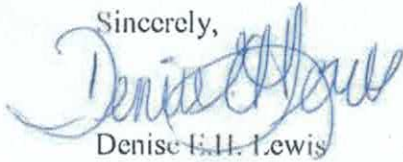
As you are aware, the Virgin Islands were devastated by two major hurricanes in 2017. These hurricanes destroyed or severely damaged the territory's telecommunications and broadcast infrastructure. The Virgin Islands have been rebuilding its communications infrastructure with the support of our federal, local and private-sector partners. As we approach hurricane season, it is important that VITEMA be able to test and validate its IPAWS origination and distribution capabilities and the participants' ability to disseminate emergency messages to the public.

VITEMA is the sole government agency authorized to execute a coordinated operational response to a disaster in the U.S. Virgin Islands. VITEMA is also tasked with preparing the Virgin Islands for the threats from natural and man-made hazards, and with ensuring swift recovery following disasters. VITEMA is responsible for public information and warning, which includes alerts and notifications to our residents and local, state and federal officials during emergencies and incidents that impact life, safety and property. As a Caribbean U.S. territory, we are vulnerable to numerous hazards including flooding, hurricanes, earthquakes, tsunamis and acts of terrorism. The purpose of this test is to ensure the WEA and EAS will work during such emergencies and to provide VITEMA with useful data to support public warning improvements. This test will also provide an opportunity for residents to become more familiar with EAS and WEA and know how to respond and take proper action when they receive actual warning messages. Additionally, it is imperative for emergency managers to be proficient in the use of WEA and the EAS before an actual alert is necessary. VITEMA strongly believes it is important to test the system now, well before the start of hurricane season (June 1), rather than wait until May 2019 for the FCC's end-to-end testing rules to become effective.

VITEMA is currently distributing multi-media public service announcements for the Caribe Wave 2019 – Tsunami Warning Exercise which will include the proposed WEA and EAS test. The messaging will ensure the public understands the function and utility of WEA, and that the March 14th WEA and EAS messages are only a test. This plan will be shared with all Public Information Officers throughout the territory, media outlets, including local newspapers, radio and television outlets, the Agency's social media accounts and website. VITEMA has also coordinated information about the test with FEMA, territorial emergency authorities, including first responder organizations such as police, fire and the 911 Emergency Communication Centers, cellular mobile service providers, and EAS Participants to ensure they are aware of the test and can confirm to the public that the WEA message is a test.

VITEMA plans to record test results and provide a detailed account of any problems that occur in the distribution of the WEA and EAS test to your office. If you have any questions or need further information, please contact Garry Green, Public Information Officer at garry.green@vitema.vi.gov or (340) 773-2244. Contact can also be made with Denise Lewis, VITEMA Acting Director at denise.lewis@vitema.vi.gov or (340) 773-2244.

Sincerely,

A handwritten signature in blue ink, appearing to read "Denise E.H. Lewis", is written over the word "Sincerely,".

Denise E.H. Lewis
Acting Director

Cc: Mr. Alfred Kenyon, Chief, Customer Service, FEMA IPAWS
Mr. Mark Lucero, Chief, Engineering, FEMA IPAWS
Mr. Manny Centeno, Project Manager, NPWS, FEMA IPAWS
Ms. Jody Smith, Project Manager, IPAWS Lab, FEMA IPAWS
Mr. Athniel Ottley, President, Ottley Communications, EAS LP-1
Mr. Garry Green, Public Information Officer - VITEMA